

IN THE U.S. DISTRICT COURT FOR NEBRASKA

RYSTA LEONA SUSMAN, BOTH INDIVIDUALLY AND AS NATURAL MOTHER OF SHANE ALLEN LOVELAND, A PROTECTED PERSON, SHANE ALLEN LOVELAND, A PROTECTED PERSON BY AND THROUGH HIS TEMPORARY GUARDIAN AND CONSERVATOR, JOHN SAUDER, and JACOB SUMMERS,	)	CASE NO. CI 8:18-CV-00127
Plaintiffs,	)	<b>REQUEST FOR ORAL ARGUMENTS CONCERNING KEARNEY'S PETITION TO INTERVENE, DOC NO. 95</b>
vs.	)	
THE GOODYEAR TIRE & RUBBER COMPANY,	)	
Defendant.	)	

COMES NOW, Kearney Towing and Repair Center, Inc. ("Kearney") NeCivR 7.1 and, hereby respectfully requests oral arguments concerning its Petition to Intervene, Doc. No. 95, for purposes of modifying the existing Protective Order in this case Doc. No. 66 so that documentation produced in this case can be produced for and utilized in a collateral case filed by Plaintiffs against Kearney in Nebraska state court. It is suspected that oral arguments and/or a hearing concerning this matter may assist the parties in reaching a resolution of this discovery dispute without further court intervention or a ruling on the Petition. It is believed that 30 minutes is necessary for the arguments/hearing, which could be completed telephonically to ease any burden on the Court or the parties in scheduling these arguments/hearing.

Respectfully submitted,

KEARNEY TOWING & REPAIR CENTER, INC., A  
NEBRASKA CORPORATION

By: \_\_\_\_\_

  
Stephen G. Olson, II, #18949  
Kristina J. Kamler, #24082  
ENGLES, KETCHAM, OLSON & KEITH, P.C.  
1350 Woodmen Tower  
1700 Farnam Street  
Omaha, Nebraska 68102  
(402) 348-0900 (Telephone)  
(402) 348-0904 (Facsimile)  
solson@ekoklaw.com  
kkamler@ekoklaw.com

## CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Michael F. Coyle  
Fraser Stryker PC LLO  
500 Energy Plaza  
409 South 17<sup>th</sup> Street  
Omaha, NE 68102  
[mcoyle@fraserstryker.com](mailto:mcoyle@fraserstryker.com)  
**Attorney for Plaintiff**

Paul E. Godlewski  
Schwebel Goetz & Sieben, P.A.  
5120 IDS Center  
80 S. 8th Street, #5120  
Minneapolis, MN 55402  
[pgodlewski@schwebel.com](mailto:pgodlewski@schwebel.com)  
**Attorney for Plaintiffs**

Skip Edward Lynch  
Kaster Lynch Farrar & Ball LLP  
1010 Lamar, Suite 1600  
Houston, TX 77002  
[Skip@thetirelawyers.com](mailto:Skip@thetirelawyers.com)  
**Attorney for Plaintiffs**

Kyle Farrar  
Farrar & Ball LLP  
1010 Lamar, Suite 1600  
Houston, TX 77002  
[Kyle@fbtrial.com](mailto:Kyle@fbtrial.com)  
**Attorney for Plaintiffs**

William R. Ogden  
1117 Herkimer Street  
Houston, TX 77008  
[bill@fbtrial.com](mailto:bill@fbtrial.com)  
**Attorney for Plaintiffs**

Edward S. Bott, Jr.  
Clark Hedger  
Juliane M. Rodriguez  
10 South Broadway, Suite 2000  
St. Louis, MO 63102  
[esb@greensfelder.com](mailto:esb@greensfelder.com)  
[chl@greensfelder.com](mailto:chl@greensfelder.com)  
[jrodriguez@greensfelder.com](mailto:jrodriguez@greensfelder.com)  
**Attorneys for Defendant**

Jennifer D. Tricker  
Woodmen Tower  
1700 Farnam Street  
Omaha, NE 68102  
[jtricker@bairdholm.com](mailto:jtricker@bairdholm.com)  
**Attorney for Defendant**

/s/ Kristina J. Kamler